

# EXHIBIT K

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**Christina P. Mott**

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**From:** Elizabeth Hurley <EHurley@Gssp-lawyers.com>  
**Sent:** Monday, October 30, 2017 5:28 PM  
**To:** Christina P. Mott; Lindsay Faucher; exeterlaw@aol.com  
**Cc:** Chris J. Poulin  
**Subject:** RE: Falletta

Hi Christina,  
It turns out that 11/30 no longer works for us. I apologize for the inconvenience. Looks like we will have to aim for December. Lindsay will send some new dates around.  
Elizabeth

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**From:** Christina P. Mott [mailto:CMott@adlercohen.com]  
**Sent:** Tuesday, October 17, 2017 4:33 PM  
**To:** Lindsay Faucher; exeterlaw@aol.com  
**Cc:** Chris J. Poulin; Elizabeth Hurley  
**Subject:** RE: Falletta

Hi Lindsay,

We are still working on shuffling a few things to make one of those days work. It's looking like the only possible date will be 11/30/17, but I still need to confirm with Dr. Hoerdtorfer. I should have an answer to you in the next day or so.

Thanks for the patience,  
Christina

Adler|Cohen|Harvey|Wakeman|Guekguezian LLP

Massachusetts | Rhode Island | New Hampshire

**Christina P. Mott** 75 Federal Street  
Attorney Boston, Massachusetts 02110  
tel 617 423 6674

CMott@adlercohen.com www.adlercohen.com

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**From:** Lindsay Faucher [mailto:lfaucher@Gssp-lawyers.com]  
**Sent:** Tuesday, October 17, 2017 4:30 PM  
**To:** Christina P. Mott; exeterlaw@aol.com  
**Cc:** Chris J. Poulin; Elizabeth Hurley  
**Subject:** RE: Falletta

Counsel,

November 7<sup>th</sup> and 14<sup>th</sup> are no longer available for either Chris or Elizabeth. Attorney Sullivan has indicated that Dr. Connelly is available on Tuesday, November 21<sup>st</sup>. We have not yet confirmed a start time or location for Dr. Connelly's deposition; I hope to have that information to you by the end of the week.

The following dates are still available for Dr. Hoertdoerfer's deposition:

Thursday 11/16/17  
Friday 11/17/17  
Wednesday 11/29/17  
Thursday 11/30/17

I am doing my best to hold these dates for both Chris and Elizabeth but I cannot hold them indefinitely. Please let me know as soon as possible if Dr. Hoertdoerfer is available on any of these dates.

Thank you,  
Lindsay Faucher

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**From:** Lindsay Faucher  
**Sent:** Tuesday, October 17, 2017 9:43 AM  
**To:** 'Christina P. Mott'; 'exeterlaw@aol.com'  
**Cc:** Chris J. Poulin; Elizabeth Hurley ([EHurley@Gssp-lawyers.com](mailto:EHurley@Gssp-lawyers.com))  
**Subject:** RE: Falletta

Counsel,

November 28<sup>th</sup> is no longer available for either Chris or Elizabeth. Please let me know as soon as possible what date(s) your clients are available.

Thank you,  
Lindsay Faucher

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**From:** Lindsay Faucher  
**Sent:** Tuesday, October 10, 2017 10:51 AM  
**To:** 'Christina P. Mott'; [exeterlaw@aol.com](mailto:exeterlaw@aol.com); Elizabeth Hurley  
**Cc:** Chris J. Poulin  
**Subject:** RE: Falletta

Counsel,

Attorneys Hurley and Poulin are available the following dates for depositions:

Tuesday 11/7/17 (available after 10:30am)  
Tuesday 11/14/17  
Thursday 11/16/17  
Friday 11/17/17  
Tuesday 11/21/17 (available until 3:00pm)  
Tuesday 11/28/17  
Wednesday 11/29/17  
Thursday 11/30/17

Please let us know what date(s) will work for you and your clients as soon as possible.

Thank you,  
Lindsay Faucher

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**From:** Christina P. Mott [<mailto:CMott@adlercohen.com>]  
**Sent:** Tuesday, October 10, 2017 9:34 AM  
**To:** [exeterlaw@aol.com](mailto:exeterlaw@aol.com); Elizabeth Hurley  
**Cc:** Chris J. Poulin; Lindsay Faucher  
**Subject:** RE: Falletta

Counsel,

I have 9/15 diaried as the deadline for disclosure of expert discovery, and 11/15 as the summary judgment filing deadline.

Elizabeth – let us know with a couple dates for taking Dr. H's deposition and we will check with his and our schedules.

Thanks,  
Christina

Adler | Cohen | Harvey | Wakeman | Guekguezian LLP  
Massachusetts | Rhode Island | New Hampshire

**Christina P. Mott**                      75 Federal Street  
Attorney                                  Boston, Massachusetts 02110  
tel 617 423 6674

[CMott@adlercohen.com](mailto:CMott@adlercohen.com)              [www.adlercohen.com](http://www.adlercohen.com)

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**From:** [exeterlaw@aol.com](mailto:exeterlaw@aol.com) [<mailto:exeterlaw@aol.com>]  
**Sent:** Thursday, October 05, 2017 12:04 PM  
**To:** [EHurley@Gssp-lawyers.com](mailto:EHurley@Gssp-lawyers.com); Christina P. Mott  
**Cc:** [cpoulin@gssp-lawyers.com](mailto:cpoulin@gssp-lawyers.com); [lfaucher@gssp-lawyers.com](mailto:lfaucher@gssp-lawyers.com)  
**Subject:** Re: Falletta

Discovery will be in the mail today.  
If you mean that the defendant's disclosure of expert was 9/15, I have it as 11/15.  
Mark Sullivan

In a message dated 10/5/2017 11:48:30 AM Eastern Standard Time, [EHurley@Gssp-lawyers.com](mailto:EHurley@Gssp-lawyers.com) writes:

Hello Mark and Christina,

Lindsay just reminded us that the close of discovery is 11/8, although it looks as though we can do depositions until 1/6/18. Also, I believe that the defendants' expert discovery deadline was last month on 9/15 and we haven't received anything.

We would like to take the depositions of both Dr. Connelly and Dr. H. The latter's discovery responses are due 11/6, the former's 9/22. With Dr. Connelly, we expect executed authorizations and need time to secure the requested documents before his deposition. Mark, when do you expect that you will be able to provide responses? Can we agree to 2 weeks? That should allow us to proceed with depositions in mid-November. Lindsay will begin circulating dates that Chris and I are available. We expect that Dr. Connelly's will take a full day whereas Dr. H's about ½ a day.

Thank you,

Elizabeth

Elizabeth Hurley, Esq

Getman, Schulthess, Steere & Poulin, P.A.

1838 Elm Street

Manchester, NH 03104

Tel. (603) 634-4300 ext. 788 Fax (603) 626-3647

Ehurley@gssp-lawyers.com

www.gssp-lawyers.com

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